



Compliance Verification Report St. Louis Composting, Inc. Valley Park Facility

Presented to:

**St. Louis Composting, Inc.
39 Old Elam Avenue
Valley Park, Missouri 63088**

And

**U.S. Environmental Protection Agency – Region 7
Water, Wetlands and Pesticides Division
11201 Renner Boulevard
Lenexa, Kansas 66219**

Presented by:

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CERTIFICATION

By means of this certification, the undersigned affirms that the site inspection and evaluation, as well as this Compliance Verification Report have been prepared in accordance with good engineering practice, including consideration of industry standards, and in accordance with requirements of Administrative Compliance Order on Consent (AOC) issued by the Environmental Protection Agency (EPA) on April 11, 2016. SCS Engineers ("Verifier") has conducted a comprehensive verification of STLCL's Valley Park Facility compliance with the requirements of the AOC and acted independently and objectively when performing all activities related to assessing compliance.

Prepared by:



Anastasia Welch, P.E.
Project Manager
SCS Engineers

1 INTRODUCTION

This Compliance Verification Report (Report) is being concurrently submitted to the U.S. Environmental Protection Agency (EPA) in accordance with Paragraph 37 of the Administrative Compliance Order on Consent (AOC) Issued by the EPA on April 11, 2016 and to St. Louis Composting, Inc. (STLC) in accordance with the February 4, 2016 proposal. This report details the inspection and verification of STLC's Valley Park facility (the Facility) located at 39 Old Elam Avenue, Valley Park, Missouri. The purpose of the verification is to assess adherence to the Facility-specific Storm Water Pollution Prevention Plan (SWPPP) and National Pollutant Discharge Elimination System (NPDES) permit. Inspection findings are contained within the Report along with SCS Engineers' (SCS) recommended improvements to the Facility storm water management practices.

Questions or comments regarding the material covered in this Report may be addressed to the following SCS personnel (as the Verifier):

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2 ON SITE VERIFICATION

The Facility was visited on October 4, 2016 by Mr. Timothy Pool of SCS. He was escorted by Mr. Dave Gavlick, Vice President of Operations for STLCC. During the site inspection, the Facility was operating at normal capacity.

2.1 SWPPP REVIEW

Prior to walking through the Facility, SCS reviewed the Facility's SWPPP. The Plan is kept inside the Facility's main office. All site staff are made aware of the SWPPP's location, according to Mr. Gavlick.

The Facility's SWPPP is current and dated November of 2009. The SWPPP has no seal from a professional engineer. Mr. Gavlick signed the SWPPP as an authorized representative of STLCC. STLCC has retained a consultant to update the Facility's SWPPP and that process is currently ongoing. A copy of the Facility's SWPPP can be found in **Attachment C**.

Conclusions from the SWPPP review are presented below. Further details can be found on the NPDES Inspection Worksheet located in **Attachment A**.

- 1) The Facility has had no significant spills over the last three-year period; no spill locations are listed in the report or on Figure 2 of the SWPPP.
- 2) The SWPPP does not identify which process each individual control is intended to manage. The controls identified are intended to minimize non-storm water discharges from the various processing areas, depending on the control location at the Facility. Types of controls utilized by STLCC are located in Section 4 of the SWPPP.
- 3) Only Outfall #001 is listed on the Facility's SWPPP, as well as the Facility's NPDES permit, but the Facility displays a sign indicating two outfalls. SCS recommends this inconsistency be addressed.
- 4) The SWPPP's figure does not indicate the locations of storm water controls other than the grass drainage areas. SCS suggests that these controls be included in the SWPPP's figure.
- 5) Reporting, training, and inspection records were reviewed and are discussed in Section 3 of this Report.
- 6) The SWPPP outlines the sampling program in Section 3.8. SCS suggests that the section be expanded to include the sampling standard operating procedures.
- 7) The Facility utilizes numerous ASTs with total volumes that exceed the 1,320-gallon threshold for the requirement of a Spill Prevention Control and Countermeasures (SPCC) Plan. The Facility has an SPCC Plan and has retained a consultant to update this Plan in conjunction with its SWPPP.

2.2 FACILITY SWPPP COMPLIANCE REVIEW

Following the SWPPP review, SCS conducted a site inspection to verify the implementation of the storm water controls outlined in the SWPPP. Mr. Gavlick escorted SCS during the site inspection. SCS

inspected the installation and maintenance of the storm water controls and noted any visual indications that storm water controls were not working properly. This includes areas of concern needing improvement that are not currently discussed in the SWPPP. In the following table are observations and recommendations from the site inspection. Further details can be found on the NPDES Inspection Worksheet located in **Attachment A**. An inspection photo log is presented in **Attachment B**.

#	Observation	Recommendation
1	AST locations at Facility do not match up with SWPPP figure.	Update AST locations in the new SWPPP and SPCC Plan.
2	Outfall #002 is marked at the Facility, but not on the site figure or in the Facility's NPDES permit provided at inspection.	Correct the SWPPP and signage so outfall information is correct and consistent in all site-related documents.
3	Damaged filter socks were noted.	Replace damaged filter socks.
4	Buildings not labeled in the same fashion as indicated on the SWPPP.	For ease of inspection and site identification label all buildings in a clear manner.
5	AST fuel nozzles not properly stored.	Train all staff to properly replace fuel nozzles in proper receptacles when not in use.
6	Trash receptacles open to storm water.	Provide lids for onsite trash receptacles.
7	Storm water retention pond in northwest corner not shown on figure.	Include the new storm water retention pond on the SWPPP figure.
8	An appropriately calibrated meter for measuring temperature and pH is not used during sample collection (SWPPP, Section 5.8).	None. Client is researching appropriate meters. Following identification and purchase, use meter to measure pH and temperature during sample collection.

3 RECORDS EVALUATION

SCS was provided a digital copy of all testing records as well as photocopies of any training, and inspection records kept on site. Due to the remote nature of the Facility, the records had to be removed from the site for photocopying purposes. Photocopying was performed by STLC staff and all materials were promptly returned to the Facility.

The records review consisted of five major areas:

- 1) Quarterly and/or annual discharge monitoring reports (DMRs) as required by the NPDES permit;
- 2) Annual reports regarding operational requirements as required by the NPDES permit;
- 3) Inspection records as required by the SWPPP;
- 4) Training records as required by the SWPPP; and
- 5) Updates to SWPPP recording changes that have occurred at the Facility.

3.1 DMR REPORTING

SCS examined the DMR records for the Facility spanning a time period from 2013 until present. DMRs were provided to SCS via a flash drive. Photocopies of the DMRs can be found in **Appendix D**. The table below summarizes observations and recommendations regarding the submitted DMRs.

Verification Item	Observation or Recommendation
General DMRs	<i>Paper copies should be kept on site for a period of three years.</i>
2013 DMR	Records present for each quarterly DMR show "no discharge"
2014 DMR	Records present for each quarterly DMR show "no discharge"
2015 DMR	No record of first quarter DMR.
	<i>If this DMR was submitted to the MDNR, it should be maintained on site.</i>
	Records present for the remaining quarters showing "no discharge"
2016 DMR	First quarter DMR shows "no discharge"
	A revised DMR was provided with the first quarter DMR noting that the report was submitted in a new format.
	<i>Suggest the original submittal be maintained on site with the revised DMR.</i>
	No record of the second quarter DMR.
	<i>If this DMR was submitted to the MDNR, it should be maintained on site.</i>
	No record of the third quarter DMR.
	<i>If this DMR was submitted to the MDNR, it should be maintained on site.</i>

3.2 ANNUAL REPORTS

SCS examined the annual reporting records for the Facility spanning 2013 to present. These reports were provided on the same flash drive as the DMRs. SCS reviewed these reports to insure they met the five criteria listed in the Facility's NPDES permit. The criteria are as follows:

- 1) Information on quantities and types of all raw materials stockpiled or composted during the year;
- 2) Results of any testing performed;
- 3) Quantity of compost sold, disposed or given away;
- 4) Quantity of composting materials on site at the end of the year; and
- 5) STLCL shall submit the annual report of January 28 each year for the previous calendar year.

Copies of the annual reports are contained in **Appendix E**. The table below summarizes observations and recommendations regarding the submitted annual reports:

Verification Item	Observation or Recommendation
2013 Annual Report	Report was resubmitted to the MDNR on February 2016 as STLCL did not have a record of prior submittal. Report meets NPDES criteria.
2014 Annual Report	Report is not dated but meets the NPDES criteria.
	Recommend that STLCL maintain dated copy in the file.
2015 Annual Report	Report meets the NPDES criteria.

3.3 INSPECTION RECORDS

As per Section 3.a. of the Facility's NPDES permit (December 2012):

Staff of the permitted facility shall inspect, at least weekly, any structures that function to prevent pollution of storm water or to remove pollutants from storm water and of the facility in general to ensure that any Best Management Practices are continually implemented and effective. The inspections must include observation and evaluation of BMP effectiveness, deficiencies, and corrective measures that will be taken. Deficiencies must be corrected within seven days and documented in the SWPPP. A log of inspection reports must be kept with the SWPPP. These must be made available to DNR personnel upon request.

SCS located copies of the inspection records for the Facility in the SWPPP. These records are located in **Appendix F**. The table below summarizes observations and recommendations regarding the records:

Verification Item (General Reports)	Observation or Recommendation
1	Only reports provided were from January 2016 to present; dedicated to the SWPPP. Records from 2014 and 2015 combined safety sheets as well as SWPPP items.
	<i>STLC should maintain SWPPP inspection forms separate of site safety forms.</i>
2	Some forms are signed illegibly by the individual who performed the inspection.
	<i>All inspectors should print their name as well as initial or sign each inspection form.</i>
3	The inspection records provide adequate information to meet the requirements of the permit.
	<i>Notes should indicate schedule for corrective actions and when they are complete.</i>
4	<i>As the inspection records continue to accumulate, they should be moved to a separate binder and maintained with the SWPPP.</i>

3.4 TRAINING RECORDS

SCS examined the training records for the Facility as required by the NPDES permit and included in the SWPPP. Contents of the on-site training are located in Section 5 and Appendix I of the SWPPP. Records of individuals trained are located in Appendix B of the SWPPP and a copy of these records is located in **Appendix G** of this Report. The table below summarizes observations and recommendations regarding the general training forms.

Verification Item (General Training Form)	Observation or Recommendation
1	Not all individuals who filled out weekly inspection forms are listed on the training form.
2	From NPDES Permit – All individuals involved in material handling, storage, and housekeeping areas containing materials exposed to storm water are required to have sufficient training.
	<i>Individuals involved in the inspection of the Facility or Facility Maintenance need to sign the training sheet to confirm they have received proper training.</i>
3	Only training records provided were for 2016.
	<i>STLC should maintain all training records for a minimum of three years.</i>

3.5 UPDATES TO SWPPP

Currently, there are no records of a SWPPP update for the Facility. STLC has retained a consultant to update the Facility's SWPPP and SPCC. If any updates to the new SWPPP take place in response to an inspection, such changes should be recorded and documented in the SWPPP.

4 CONCLUSION

SCS finds that the Facility performs satisfactorily in accordance with its SWPPP and NPDES permits. An update to the SWPPP and SPCC Plan is currently underway to address deficiencies noted in Section 2.1. The Facility shows no evidence of non-storm water discharges leaving the site. Storm water sampling records show that the Facility does not typically discharge. Deficiencies are generally noted within the tables in Sections 2 and 3 and should be addressed following the receipt of this Report.